

**DECLARATION OF BEHROUZ S. ARANI**

I, Behrouz S. Arani, declare as follows:

1. I am an attorney duly licensed and entitled to practice in the State of California and before this honorable Court. I am associated with Lehrman Law Group, attorneys of record for defendant in this matter. I am personally familiar with the facts set forth herein and if called as a witness in this case, I could and would competently testify hereto.

2. The facts set forth in the foregoing Memorandum are true and correct.

3. The exhibits attached hereto are true and correct copies of the documents. Specifically, a true and correct copy of email correspondence between plaintiff's and defendant's counsel is attached hereto as Exhibit A. Further, a true and correct copy of BMW NA's Offer of Judgment of July 10, 2018 is attached as Exhibit B. Finally, a true and correct copy of plaintiff's counsel's settlement demand email of June 14, 2018 is attached hereto as Exhibit C.

4. There were no depositions, no vehicle inspections, no discovery disputes, and no dispositive motions in this case. The matter involved only one court hearing. No discovery referee was appointed; no IDC was conducted; and no Court-mandated settlement conferences were scheduled or completed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 29<sup>th</sup> day of October, 2018 at Los Angeles, California.

/s/ Behrouz S. Arani  
Behrouz S. Arani